



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

1650 Arch Street

Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

AUG 17 2017

Don Wicburg, General Manager and Vice President
Williams Ohio Valley Midstream LLC
100 Teletech Drive, Suite 2
Moundsville, WV 26041

Re: Clean Air Act Compliance at Oak Grove Facility

Dear Mr. Wicburg:

As you are aware, the United States Environmental Protection Agency ("EPA" or the "Agency"), in conjunction with the United States Department of Justice ("DOJ"), is currently engaged in discussions with Williams Ohio Valley Midstream ("Williams OVM") regarding Clean Air Act ("CAA") compliance at Williams OVM's Moundsville facility located at 200 Caiman Drive, Moundsville, WV. I am writing to apprise Williams Ohio Valley Midstream LLC ("Williams OVM") of Clean Air Act compliance issues identified by EPA at Williams OVM's Oak Grove facility located at 52558 Fork Ridge Rd. Moundsville, WV 26041 (the "Facility"). On the basis of a compliance evaluation conducted pursuant to the authority of the CAA, Section 114, 42 U.S.C. § 7414, EPA has determined that Williams OVM has failed to comply with certain requirements of the CAA, including provisions of the new source performance standards ("NSPS") for crude oil and natural gas production, transmission and distribution, promulgated under Section 111 of the CAA, 42 U.S.C. § 7411, and codified at 40 C.F.R. Subpart OOOO (§§ 60.5360 - 60.5499) ("NSPS Subpart OOOO").

The violations have occurred and are occurring at the Facility and were first identified at the time of EPA's initial CAA inspection of the Facility on July 28-30, 2015 (the "EPA inspection") and confirmed through review of additional information submitted by Williams OVM to EPA pursuant to subsequent information requests made by EPA pursuant to Section 114 of the CAA, 42 U.S.C. § 7414. Specific violations identified by EPA include the following:

- (a) failing to record a list of identification numbers for its facility connectors or debutanizer components in a log as set forth in 40 CFR § 60.486a(e)(1);
- (b) failing to identify connectors subject to 40 CFR § 60.482-11a(g);

- (c) failing to monitor connectors within the time set forth in 40 C.F.R. § 60.486a(e)(1);
- (d) failing to monitor 510 debutanizer valves within 180 days of their startup on December 12, 2014, as set forth in 40 C.F.R. § 60.482-1a(a);
- (e) failing to monitor 4 debutanizer pumps within 180 days of startup their startup on May 28-29, 2014, as set forth in by 40 C.F.R. § 60.482-2a; and
- (f) failing to conduct monthly monitoring of a stabilizer pump for a period of four months, as set forth in 40 C.F.R. § 60.482-2a(a)(1).

EPA looks forward to discussing the above-identified violations with Williams OVM and welcomes the opportunity to do so in conjunction with the ongoing discussions regarding Williams OVM's Moundsville facility. If you have any questions regarding this letter, please contact James Adamiec of my staff at (215) 814-2175, or Daniel Boehmcke of the Office of Regional Counsel at (215) 814-2607.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Zelma Maldonado', with a stylized flourish at the end.

Zelma Maldonado,
Associate Director of Enforcement
Air Protection Division

cc: Daniel Boehmcke
Assistant Regional Counsel

Ashley L. O'Neill, Williams